

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:18-cv-10819

**DONNA GAVIN,
Plaintiff,**

v.

**BOSTON POLICE DEPARTMENT
and MARK HAYES
Defendants.**

**MOTION *IN LIMINE* TO EXCLUDE, OR LIMIT,
TESTIMONY OF THOMAS G. STACK**

Now comes the Defendant Boston Police Department who hereby moves *in limine* to exclude or limit the testimony of Thomas G. Stack on the grounds that: (i) Mr. Stack's testimony is not relevant to the present litigation; and (ii) Mr. Stack's testimony is on matters that cannot be scientifically verified.

In support of the motion, the Boston Police Department submits this motion and accompanying memorandum of law with exhibits.

For the reasons set forth herein and in the accompanying memorandum of law, the Boston Police Department respectfully requests that the Court exclude or limit the testimony and opinion of Thomas Stack.

Dated: September 15, 2021

Respectfully submitted:

CITY OF BOSTON

By its attorneys:

HENRY C. LUTHIN
Corporation Counsel

/s/ Nieve Anjomi

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I spoke with Plaintiff's Counsel on September 14, 2021 by telephone pursuant to Local Rule 7.1 in an effort to narrow the issue raised here.

Dated: September 15, 2021

/s/ Nieve Anjomi
Nieve Anjomi

CERTIFICATE OF SERVICE

I, Nieve Anjomi, hereby certify that a true copy of the above document will be served upon all parties of record via this court's electronic filing system and upon any non-registered participants via first class mail on the date listed below.

Dated: September 15, 2021

/s/ Nieve Anjomi
Nieve Anjomi